

Appl. No. 09/629,601
Amdt. dated October 7, 2004
Reply to Office action of July 16, 2004

REMARKS/ARGUMENTS

Applicants received the Office action dated July 16, 2004, in which the Examiner acknowledged that Applicants' Appeal Brief was meritorious and, as a result, the Examiner withdrew the previous grounds for rejecting the claims. The present Office action includes new grounds for rejecting some of the claims. The Examiner now rejects claims 1-3, 9-12, 14-18, 23, and 25 as obvious over the combination of Rikukawa (U.S. Pat. No. 5,940,629) and DeKoning (U.S. Pat. No. 6,178,520). The Examiner also concluded that dependent claims 4-8, 13, 19-22, and 24 would be allowed if rewritten in independent form. Applicants, however, believe no claim amendments are necessary to overcome the rejections. Based on arguments below, Applicants respectfully request reconsideration and allowance of all pending claims.

Claim 1 requires "a control board including control logic adapted to determine an arrangement of connectors coupled to the input/output connectors and configure the segmentable bus to define a plurality of storage device arrays based on the arrangement." The Examiner correctly conceded that Rikukawa does not disclose the limitation quoted above. Instead, the Examiner turns to col. 8, lines 48-67 of DeKoning. That passage, however, does not teach or even suggest the quoted limitation from claim 1. Of relevance to claim 1, DeKoning does not disclose configuring a segmentable bus to define arrays of storage devices based on an arrangement of connectors. It is not at all clear to Applicants why the Examiner believes DeKoning discloses the quoted claim limitation. Clarification is respectfully requested. To the extent the Examiner continues to reject claim 1, the Examiner is respectfully requested to call the undersigned to discuss the rejection. At any rate, at least for the reason articulated above, Applicants submit that claim 1 and all claims that depend from claim 1 are allowable over the art of record.

With regard to claim 15, the Examiner seems to have misread the limitations set forth in that claim. The Examiner states, for example, that Rikukawa discloses a "backplane." Claim 15, however, does not require a backplane. Additionally, the Examiner states that Rikukawa discloses a "control

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board" that includes a "control logic" that performs various functions. Claim 15 is a method claim that does not recite such structure. In a similar fashion, the Examiner also seems to have misread the limitations of claim 25. Clarification is respectfully requested to the extent that the Examiner opts to continue rejecting claims 15 and 25 and associated dependent claims.

Claim 15 requires "grouping subsets of the storage devices onto isolated bus segments in the storage array based on the arrangement of connectors." The Examiner acknowledges that Rikukawa does not teach this limitation, but argues that this limitation is disclosed in DeKoning at col. 9, line 39 through col. 10, line 14. That passage relates to an "environmental monitoring and storage device" that "maintains environmental information regarding the subsystem..." The only discussion of grouping of devices that Applicants find in the cited passage of DeKoning is at col. 9, lines 48-51 which state: "For packaging and usability reasons, an environmental services card is associated with each physical grouping of disk drives (e.g., in a mounting bay adapted for a plurality of disk drives)." This feature of DeKoning is clearly different than "grouping subsets of storage devices onto isolated bus segments in the storage array based on the arrangement of connectors." Applicants do not read DeKoning as at all disclosing the limitation quoted above. At least for this reason, claim 15 and all claims that depend from claim 15 are allowable over the art of record.

Claim 25 requires "means for grouping subsets of the storage devices onto isolated bus segments in the storage array based on the arrangement of connectors." As explained above, none of the art of record teaches or suggests this limitation. For at least this reason, claim 25 is allowable over the art of record.

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may

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be other distinctions between the claims and the cited art which have yet to be raised, but which may be raised in the future.

Applicants respectfully request reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,



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